

AUG 21 2015

Mr. Paul V. Rosasco
Project Coordinator
Engineering Management Support, Inc.
7220 West Jefferson Avenue, Suite 406
Lakewood, CO 80235

Dear Mr. Rosasco:

The U.S. Environmental Protection Agency has reviewed the August 14, 2015 submittal titled, "Responses to US Environmental Protection Agency (EPA) July 31, 2015 Comments on the July 6, 2015 Work Plan for Additional Characterization of Extent of Radiologically-Impacted Material in Areas 1 and 2, West Lake Landfill Operable Unit-1, Bridgeton, Missouri" as prepared by Engineering Management Support, Inc. (EMSI) on behalf of Cotter Corporation (N.S.L.), Bridgeton Landfill, LLC., Rock Road Industries, Inc. and the United States Department of Energy (the Respondents).

This letter provides conditional approval of the work plan for the purpose of scheduling field crews. Final approval is conditional upon incorporation of the enclosed comments into a revised Work Plan Addendum. The revised Work Plan Addendum shall then be submitted to the EPA within 7 calendar days of receiving this letter, along with any necessary addendum to the existing site Quality Assurance Project Plan. Once these documents are approved as final, the responsible parties shall be directed to proceed with execution of the additional work.

The EPA appreciates the responsible parties' cooperation in this matter and looks forward to the completion of characterization for the radiologically impacted materials (RIM). If you have any questions regarding this letter or need further clarification on our comments, please email or contact me at (913) 551-7611.

Sincerely,

Brad Vann
Remedial Project Manager
Missouri/Kansas Remedial Branch
Superfund Division

Enclosures

cc: Shawn Muenks, MDNR

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Name	Vann	Field	Peterson	<i>CNSL</i>	
Branch	MOKS	MOKS	SUPR	<i>STOY</i>	
Signature	<i>Br Vann 8/20/15</i>	<i>CF</i>	<i>MPD</i>		
Date	<i>8/20/15</i>	<i>8/21/15</i>	<i>8/21/15</i>		

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EPA Clarification Comments:

1. The EPA concurs with the parties' response to the EPA's General Comment 1, and the inclusion of "Explicit statements" in the revised document. To reinforce this expectation and prior discussion with technical representatives from EMSI and Arcadis during the August 13, 2015 meeting with EPA, the parties will need to ensure there is a clearly stated priority to complete the 25 borings and all associated work regarding the Area 1 & 2 RIM calculations. All other proposed work, though important, is secondary and will not delay the Area 1 and Area 2 primary effort.
2. The EPA concurs with the parties' response to the EPA's General Comment 2, and understands that the proposed Fate and Transport sampling will require changes to existing DQOs and the site QAPP and will expedite its review upon submission. Sampling associated with sediment sampling was historically performed under existing approved site documents but should be reviewed to determine if an update to the existing site document is warranted. Email sent to parties' contract representatives (EMSI/Arcadis) on August 15, 2015 withdrew the EPA emailed comment 2 requiring the collection of sediment samples prior to starting the vegetation clearing, as this data already exists historically and therefore has limited utility. The EPA would still expect the sediment sampling to occur following heavy precipitation event(s) as identified in the work plan during the pre-mobilization vegetation removal and drill pad construction. Need to collect these samples or potential QAPP addendum should also not delay mobilization and subsequent fieldwork, as they can always be collected at the end of the fieldwork.
3. The EPA concurs with portions of the parties' response to EPA's Specific Comment 6 (Reporting), and with not performing the geotechnical sampling at this stage, as this information can be reasonably collected during design phase for the Isolation Barrier. Based on the August 13, 2015 technical discussion, the EPA's reporting expectations are amended and should be included in the revised work plan addendum as follows:
 - a. Phase 1 GCPT/Sonic investigation report – Possible delays on deliverables for the EPA's IB decision can be mitigated by the parties submitting the validated field data, revised site figures and tables which EPA can use in the pending IB decision. Please submit those deliverables within 30 calendar days as originally requested following the completion of full data package validation. If the list of reported preparation activities are staggered, the final comprehensive report will be due no later than 45 calendar days following the completion of data validation. Following regulatory review and comment, the EPA would then expect a revised document in 30 calendar days as this document has significant complexity and content.
 - b. Area 1 and 2 Data Report – This draft report is due to the EPA for review within 45 calendar days of receiving the validated analytical data, and the EPA anticipates parties would utilize the validated data for the generation of other related site documents (Partial Excavation, etc.) to maximize delivery of those subsequent deliverables. Following regulatory review and comment, the EPA expects a revised document in 20 calendar days as the data deliverable has minimal complexity.
 - c. Comprehensive Report – Requirements for the submission of a comprehensive report, as previously directed, are under internal review with the EPA and further direction shall be provided to the parties. Identification of the document within the field schedule can be deleted.

4. The EPA concurs with the parties' response to EPA's Specific Comment 8a-8e ("Schedule"), and agrees that these actions, if effective, such as deployment of other drilling technologies, overlapping field activities, etc., can significantly reduce the draft work schedule by several weeks as previously commented. Following the August 13, 2015 technical meeting, it was understood that while this schedule represents a "worst-case" scenario, it also provides sufficient float to absorb unforeseen delays, which makes it longer in overall duration than likely necessary. Based on prior comments (deletion of comprehensive report above) and these discussions, the schedule can be shortened by 4 weeks without impacting completions. Any delays can then be addressed as the schedule progresses, but should not be built-in on the front end by assumption. Please amend the schedule accordingly in the revised submittal. In the near future, the EPA will propose to the PRP group a path forward for incorporating all additional data collected under Phase 1 GCPT / Sonic Drilling, Area 1 and 2 additional sampling, and other relevant new information into the existing Remedial Investigation Report.